

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

STARR INVESTMENTS CAYMAN II, INC.,

Plaintiff,

v.

C.A. No. 11-233-SLR

CHINA MEDIAEXPRESS HOLDINGS, INC.,  
DELOITTE TOUCHE TOHMATSU,  
ZHENG CHENG, JACKY LAM,  
OU WEN LIN, QINGPING LIN,  
THOUSAND SPACE HOLDINGS LIMITED,  
BRIGHT ELITE MANAGEMENT LIMITED,  
THEODORE GREEN, MALCOLM BIRD,  
A.J. ROBBINS, P.C.,

Defendants.

**DEFENDANT DELOITTE TOUCHE TOHMATSU'S  
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Upon the accompanying Opening Brief in Support of its Motion to Dismiss Plaintiff's Amended Complaint, dated September 30, 2011, the accompanying Declaration of Sng Keng Yeow, Melvin, dated September 30, 2011, with annexed exhibits, the accompanying Declaration of Susan M. Hannigan, dated September 30, 2011, with annexed exhibits, and all prior pleadings and filings herein, Defendant Deloitte Touche Tohmatsu, a Hong Kong accounting firm ("DTT HK"), hereby moves this Court, pursuant to Rule 12(b)(2) and Rule 12(b)(6) of the Federal Rules of Civil Procedure and the doctrine of *forum non conveniens*, for an order, substantially similar to the proposed order attached hereto, dismissing the claims asserted against DTT HK in the Amended Complaint of Plaintiff Starr Investments Cayman II, Inc. The grounds for this motion are set forth in DTT HK's opening brief, filed contemporaneously herewith.

OF COUNSEL:

Lawrence J. Zweifach  
Aric H. Wu  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035  
LZweifach@gibsondunn.com  
AWu@gibsondunn.com

Dated: September 30, 2011

/s/ Raymond J. DiCamillo

Raymond J. DiCamillo (Del. Bar No. 3188)  
Susan M. Hannigan (Del. Bar No. 5342)  
RICHARDS, LAYTON & FINGER, P.A.  
920 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
DiCamillo@RLF.com  
Hannigan@RLF.com

*Attorneys for Defendant  
Deloitte Touche Tohmatsu  
(Hong Kong Partnership)*

**CERTIFICATE OF SERVICE**

I, Susan M. Hannigan, hereby certify that on September 30, 2011, the foregoing document was electronically filed with the Clerk of the Court using CM/ECF, which will send automatic notification to the following registered attorney(s) of record that the document has been filed and is available for viewing and downloading:

Andre G. Bouchard, Esq.  
Sean M. Brennecke, Esq.  
Bouchard Margules & Friedlander, P.A.  
222 Delaware Avenue, Suite 1400  
Wilmington, DE 19801

Peter B. Ladig, Esq.  
Morris James LLP  
500 Delaware Avenue, Suite 1500  
P.O. Box 2306  
Wilmington, DE 19899-2306

Albert H. Manwaring, IV, Esq.  
James G. McMillan, III, Esq.  
Pepper Hamilton LLP  
1313 Market Street, Suite 5100  
P.O. Box 1709  
Wilmington, DE 19899-1709

Michael D. Goldman, Esq.  
Potter Anderson & Corroon, LLP  
1313 N. Market St., Hercules Plaza, 6th Flr.  
P.O. Box 951  
Wilmington, DE 19899-0951

Christian D. Wright, Esq.  
James L. Higgins, Esq.  
Kristen Renee Salvatore DePalma, Esq.  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19801

Martin D. Haverly, Esq.  
Delle Donne Corporate Center  
1011 Centre Road, Suite 117  
Wilmington, DE 19805

I hereby certify that on September 30, 2011, I have sent, by electronic mail, the foregoing document to the following non-registered participants:

Nicholas A. Gravante, Jr., Esq.  
Lee S. Wolosky, Esq.  
Marilyn C. Kunstler, Esq.  
Boies, Schiller & Flexner LLP  
575 Lexington Avenue  
New York, NY 10022

Edward P. Gilbert, Esq.  
Brett D. Dockwell, Esq.  
Donald W. Chase, Esq.  
Morrison Cohen LLP  
909 Third Avenue  
New York, NY 10022

Jerome S. Fortinsky, Esq.  
Christopher R. Fenton, Esq.  
Edward G. Timlin, Esq.  
Shearman & Sterling LLP  
599 Lexington Avenue  
New York, NY 10022

Stephen D. Hibbard, Esq.  
Shearman & Sterling LLP  
Four Embarcadero Center  
Suite 3800  
San Francisco, CA 94111

Michael E. Marr, Esq.  
3107 Tyndale Ave.  
Baltimore, MD 21214-3429

Eugene R. Licker, Esq.  
Laura M. Vasey, Esq.  
Loeb & Loeb LLP  
345 Park Avenue  
New York, NY 10154-1895

Lee Ann Russo, Esq.  
Irene S. Fiorentinos, Esq.  
Jones Day  
77 West Wacker  
Chicago, IL 60601-1692

/s/ Susan M. Hannigan  
Susan M. Hannigan (Del. Bar No. 5342)